

1 Shawn R. Perez, Esq.
2 Nevada Bar No. 10421
3 **Law Offices of Shawn R. Perez**
4 7121 W. Craig Road, #113-38
5 Las Vegas, Nevada 89129
(949) 492-9545 Telephone
(702) 485-3977 Telephone
shawn711@msn.com

Ariel Mitchell, Esq. (*pro hac vice*)
The Law Office of Ariel Mitchell, P.A.
500 NW 2nd Ave. #12864
Miami, FL 33101
Tel: (305) 903-5835
ariel@arielesq.com

10 || *Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY PARHAM, et. al

13
14 Plaintiffs,
v.
15
16 SEAN COMBS, et. al.
17 Defendants.

Case No.: 3:24-cv-07191-RFL

**DECLARATION OF
SHAWN PEREZ IN
SUPPORT OF THE
ADMINISTRATIVE
MOTION TO SEAL**

DECLARATION OF SHAWN PEREZ

I, Shawn Perez, declare:

21 1. I am an attorney at law, licensed to practice before all Courts of the State of
22 California and before this Court. I have been retained by Plaintiffs in connection
23 with the above-captioned action. I make this Declaration in support of Plaintiffs
Administrative Motion to Seal.

- 1 2. On August 19, 2025, this Court entered an Order denying Defendant Desbordes
- 2 motion for sanctions and required Plaintiffs show cause as to basis of Plaintiffs
- 3 intent to proceed against Defendant.¹
- 4 3. On August 20, 2025, this Court entered an Order required Plaintiffs show cause
- 5 regarding service of Defendants.²

6 4.

7 5.

8 6.

9 7.

10 8.

11 27 ¹ ECF 54

12 28 ² ECF 55

1 9. [REDACTED]
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4 10. [REDACTED]
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10 11. [REDACTED]
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13 12. [REDACTED]
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15 13. [REDACTED]
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18 14. [REDACTED]
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21 15. [REDACTED]
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24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct.
26

27 Executed on September 14, 2025, in Las Vegas, Nevada.
28

/s/ Shawn Perez